PREPAREDNESS, PREVENTION AND CONTINGENCY (PPC) PLAN

IX. PREPAREDNESS, PREVENTION AND CONTINGENCY (PPC) PLAN

The PPC plan contained herein is submitted in accordance with 75.264 (i) of the Pennsylvania hazardous waste regulations. All required items, as outlined in DER's "Guidelines for Development and Implementation of PPC Plans" have been included in this plan. The latest revision of the plan was August 1, 1982. The plan is in need of another revision due to changes in organizational structure and minor process changes. These revisions are scheduled to be made within the next six months. The plan will also be revised to reflect the closure of the concrete block sludge filter beds as discussed in the "CLOSURE" section of this application.

NOTE: The PPC plan, on the following pages, was prepared prior to development of the Part B application. As such, page numbers in the plan are not in chronological order in relation to the numbering codes used in this document.

PREPAREDNESS, PREVENTION AND CONTINGENCY PLAN

FOR

LEEDS & NORTHRUP COMPANY

Rita S. Schreiner
Industrial Hygienist

PURPOSE

This Preparedness, Prevention and Contingency Plan (PPC Plan) is designed to minimize hazards to human health or environment from fire, explosion, or any unplanned sudden or nonsudden releases of hazardous wastes to the air, soil, or surface water.

This plan must be implemented immediately upon the occurence of a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment.

The following PPC Plan must be periodically reviewed and updated when necessary. As a minimum, changes must occur when:

1). Applicable regulations are revised

2). The plan fails in an emergency

3). Installation changes in its design or capacity

4). The list of emergency coordinators changes

Rita S. Schreiner
Industrial Hygienist

September 1, 1981
Revised: December 4, 1981
August 1, 1982

TABLE OF CONTENTS

I. General Description of Commercial Activities

Leeds and Northrup Company is a manufacturer of energy and process control instrumentation and computer systems.

L&N manufactures a variety of products including chart paper, recorders, transmitters, display instrumentation, and extensive computer systems.

Being an electronics firm, L&N generates wastes resulting from an in-house electroplating operation. This material is piped from the Plating Room Treatment Tank to the Settling Tanks outside. Here the leachate drains into an unnamed tributary of the Wissahickon Creek. This discharge is regulated by a NPDES permit.

Leeds and Northrup is a generator/storage facility as defined in the Resource Conservation and Recovery Act (RCRA). In addition to electroplating wastes, L&N generates and stores lacquer thinner, spent halogenated and nonhalogenated solvents, fluxes, acetone, trichloroehtylene, carbon tetrachloride and freon, and waste oils.

II. Seven and One-Half Minutes USGS Map (8½" X 11")

See Attachment #1

III. Facility Drawing

See Attachment #2

IV. Organization and Structure

The Safety and Maintenance Departments, together with the L&N Fire Brigade are jointly responsible for the implementation and maintenance of the Preparedness, Prevention and Contingency Plan.

1). Safety and Security Department

The Manager of Safety and Security shall act as the Primary Emergency Coordinator. The Primary Emergency Coordinator shall ensure that the goals of the Preparedness, Prevention and Contingency Plan will be carried out via a coordinated effort between these groups. The overall responsibility for reviewing the Preparedness, Prevention and Contingency Plan, instituting changes, evaluation of effectiveness, and notification of the proper authorities is detailed in the descriptions of the duties and responsibilities of the following:

1). Coordination of clean-up and rescue operations

2). Notification of state and local agencies.

3). Assess potential health or environmental hazards resulting from the incident

4). Review and critique incident upon its completion

L&N's Industrial Hygienist shall act as a Technical Assistant whose duties include the following:

1). Provide information regarding the composition and character of materials involved in the incident

2). Visually inspect the Drum Storage Area, trichloroethylene tank, sludge beds and fuel oil tanks for evidence of spills, leakage or deterioration

3). In the event of an incident, log characteristics, source, area and amount of material(s) involved

4). Ensure that the wastes from the incident are properly prepared for disposal

5). Ensure necessary reports regarding the incident are filed with the Environmental Protection Agency and Department of Environmental Resources

6). Review and revise the plan on an annual basis or as necessary including up-dates to include spills to insure its usefulness and accuracy, in conjunction with the Primary Emergency Coordinator

7). Maintain a material inventory of Wastes handled

2). Fire Brigade

The Chief of the Fire Brigade shall act as the Secondary Emergency Coordinator. The Chief's duties will include the following:

1). Oversee and direct the general activities of the Fire Brigade within corporate policy and the objectives of the Primary Emergency Coordinator

2). Act as advisor to the Primary Emergency Coordinator on fire fighting and clean-up activities

3). Establish and maintain liaison with local fire and rescue organizations, in conjunction with the Primary Emergency Coordinator

4). Evaluate effectiveness of overall Preparedness, Prevention and Contingency Plan and make formal recommendations for modifications, as necessary, to the Technical Assistants and Primary Emergency Coordinator.

The Deputy Chief, under the direction of the Chief, will share in the functions and responsibilities of the Chief. In the absence of the Chief, the Deputy Chief will assume duties and responsibilities assigned to the Chief.

3). Maintenance Department

The Maintenace foreman shall also act as a Technical Assistant whose duties include the following:

1). Provide emergency equipment necessary to clean-up or contain a hazardous material incident (See Section XVIII)

2). Provide personnel to assist in clean-up activities after having area declared safe by Primary Emergency Coordinator

3). Work with Industrial Hygienist to ensure that the waste materials involved in the incident are properly prepared for disposal

4). Ensure Maintenace personnel are properly trained in hazardous material handling

5). Ensure preventive maintenance is performed on equipment relating to conditions that could cause environmental degradation or endangerment of public health and safety. (See Item XI for further detail)

6). Coordinate spill clean-up activities

V. Material and Waste Inventory

Raw Chemical Materials

Area	Storage Mode	Material
Maintenace	20 and 55 gallon drums	Fuel Oil
(MC* = 70/20 gal.	55 gallon drums	Chlorinated Solvents
= 10/55 gal.)	55 gallon drums	Freon
	20 and 55 gallon drums	Toluene
Lacquer Room	55 gallon drums	Toluene
(MC = 15 drums)	55 gallon drums	Lacquer Thinner
		Isopropyl Alcohol
		Methyl Ethyl Ketone
		Xylol
		Acetone
Gas Analysis	Gas Cylinders	Carbon Monoxide
(MC = 100 cylinders)	Gas Cylinders	Hydrogen
	Gas Cylinders	Oxygen
Drum Storage Pad	55 gallon drums	Lonco Solve
(MC = 70 drums/raw)	55 gallon drums	Freon
	55 gallon drums	Flux (alcohol base)
	55 gallon drums	MDI foam component
Fluid Vault	55 gallon drums	Solvents
(MC = 50/55 gal.)	55 gallon drums	Lacquer Thinner
	55 gallon drums	Oil
Trichloroethylene Tank	600 gallon tank	Trichloroethylene
Fuel Oil Tanks (2)	100,000 gallon tank(ea.)	Oil
Cylinder Storage Area	Gas Cylinders	Chlorine
(MC = 200)	Gas Cylinders	Oxygen
	Gas Cylinders	Carbon Monoxide
	Gas Cylinders	Hydrogen

*MC = Maximum Capacity

V. Material and Waste Inventory (cont'd)

Waste Chemical Materials

Area	Storage Mode	Material
Drum Storage Pad (MC*= 70 drums/waste)	55 gallon drums	Spent halogenated solvents
	55 gallon drums	Spent nonhalogenated solvents
	55 gallon drums	Carbon Tetrachloride
	55 gallon drums	Acetone
	55 gallon drums	Lacquer Thinner
	55 gallon drums	Trichloroethylene
	25 gallon carboys	Acid (NCL)
Settling Beds (MC = 1,500 gals.)	above ground tank	Spent electroplating baths Stripping solutions Electroplating sludge

*MC - Maximum Capacity

Material Safety Data Sheets offering detailed information for the above materials are available in the Safety/Security Office. (Mail Drop - 274; Extension 2781, 2782 or 2783.)

VI. Housekeeping Program

Areas falling under Housekeeping Program (in-plant)

Maintenance Fluid Storage
Lacquer Room

Areas falling under Housekeeping Program (outside plant)

TCE tank
Drum Storage Pad
Fluid Vault
Fuel Oil Tanks
Cylinder Storage Area
Settling Beds

Good housekeeping practices shall include the following:

1) All drums should be stored in a neat, orderly manner.

2) Space should be left between drums so that spills can be detected.

3) Small spills should be removed using an oil absorbent material and disposed of in a drum marked waste oil/sorbent.

VI. Housekeeping Program (cont'd)

4) Drums in Lacquer Room must be grounded when in use.

5) The contents of a leaking drum should be transferred to a new drum so as to prevent further discharge.

VII. Security

The perimeter of Leeds & Northrup is surrounded by an eight foot fence. The two main gates giving access to the plant and grounds are supervised 24 hours/day by a guard service. No vehicles may be taken inside the gates surrounding Leeds & Northrup without notifying the guard and securing permission.

The guards make regular rounds of the facility. Television cameras are positioned so as to permit remote surveillance of the grounds and entrances.

Only employees with valid Leeds & Northrup badges are permitted to enter the facility. Visitors must be accompanied by a L&N employee and receive a badge which distinguishes them from L&N personnel.

The Chemical Storage area is identified and posted to prevent unauthorized personnel from entering the area.

In the event of a chemical leak or spill, the Maintenance manager and Safety/Security manager will be called.

In the event of a breech of security (break-in), the manager of Safety and Security will be called.

In the event of a problem in the Plating Room, the Plating Room foreman will be notified.

VIII. External Factors

External factors such as floods or snowstorms are of minimal considerations as L&N does not lie in a flood plain and a major snowstorm would merely postpone pickup of any hazardous wastes being stored. Further, the drums are stored on a covered pad, protecting them from inclement weather.

A strike would not affect the public in an adverse manner as a strike would result in a marked decrease in production and, therefore, the wastes generated. These wastes can be removed by managerial personnel assigned to waste removal duty in the event of a stoppage. Further, as the guard service is on an outside contract, an internal strike would not affect the security of the facility.

VIII. External Factors (cont'd)

In the event of a power outage, communications would not be interrupted as two-way radios are available. The settling beds leach their contents out and, therefore, do not rely on electricity. The drum storage area is not supplied with electricity. The plant is equipped with an emergency lighting system to facilitate egress in the event of a power outage, and fire department type battery operated hand lamps are available.

IX. Internal and External Communications

Leeds & Northrup has an intercom system throughout the plant which can alert employees and provide for transmission of immediate emergency instructions.

The East Gate guard house which is staffed around the clock is the center of communications. Guards on duty or employees can call into the East Gate using either telephone or a two-way radio.

In the event of a chemical spill the East Gate should be notified. Guard house personnel will then notify the manager of Safety and Security, the Primary Emergency Coordinator, who will determine whether outside emergency assistance is necessary. In the event of a fire, the guard house will call for outside help immediately, then notify the Emergency Response Coordinators.

X. Employee Training

The personnel involved with handling hazardous wastes are Plant Engineering and Services and the members of the Fire Brigade.

The personnel from Plant Engineering and Services, specifically Maintenance, are responsible for packaging any waste materials and ensuring that they are positioned properly on the Drum Storage Pad.

To facilitate Plant Engineering and Services efforts at handling hazardous wastes, a procedure has been developed which states how materials are to be prepared for disposal. (See Appendix A.) Following this procedure is mandatory for all wastes being picked up.

Once a small quantity labeled waste has been accepted for disposal, it may be transferred to a 55 gallon drum of the same or a compatible material only under the strict direction of the Maintenance foreman. Unidentified wastes must not be added to drums containing known materials, as a potentially dangerous chemical reaction may occur. When in doubt as to the ability to mix two materials - DON'T - then contact the Maintenance foreman or Industrial Hygienist.

X. Employee Training (cont'd)

All drums must be labeled as to the beginning accumulation date and logged as to their contents.

Any employees handling hazardous wastes are to use adequate personal protective equipment such as gloves and eye protection when transferring materials. When transferring flammables, the drum and can must be grounded.

Practices to be followed to prevent wastes from being spilled are the following:

1) All wastes stored in 55 gallon drums awaiting disposal must have bung and lid secured.

2) Waste acids must be kept in protective carboys to prevent breakage in the event a carboy is knocked over.

3) All drums should be placed on the pad in an orderly fashion.

4) Absolutely no stacking of drums two high or using broken pallets.

In the event an emergency arises (fire or chemical spill) the employee discovering the incident must inform his supervisor. He should in turn, contact Gate House who will contact the Primary Emergency Coordinator. (See XV.)

The personnel directly involved in responding to any emergency situations are the Fire Brigade members. The Fire Brigade members are trained annually at the state certified Bucks County Fire School. Here they learn the skills necessary to enable them to handle emergency situations.

Fire Brigade members also undergo First Aid training. This way, Fire Brigade members are able to assist in rescue efforts should the necessity arise.

Leeds & Northrup personnel attend a class on handling Hazardous Material Emergencies. This course, covers such topics as Recognizing and Identifying Hazardous Materials, Command and Control of Hazardous Materials and Obtaining Technical Assistance.

This course will be repeated on a regular basis. It will involve Emergency Coordinators, Technical Assistants and selected Fire Brigade, as well as Plant Engineering and Services personnel.

XI. Inspection, Monitoring and Preventive Maintenance

1) Drum Storage Area

Weekly Inspection for Log*

*Entrance to this facility is on a daily basis and so material handler can make a brief visual inspection when materials are placed in and report any incidents.

XI. Inspection, Monitoring and Preventive Maintenance (cont'd)

1) Check for chemical spillage

2) Check for leaking drums

3) Ensure wastes are separated from new chemicals

4) Check drainage ditch for spillage

5) Ensure all drums are logged in

2) Trichloroethylene Tank (unused material)

Weekly Inspection for Log

1) Check valves and fittings for leaks

2) Check pit for spillage

3) Check tank and supports for corrosion

4) Check cement foundation for deterioration

3) Sludge Beds

Weekly Inspection for Log

1) Ensure liquid level is well below tank top (two feet)

2) Check for leakage above ground

3) Monitor effluent for trace metal concentrations (from sludge bed leachate)

4) Fuel Oil Tanks

Weekly Inspection for Log

1) Check containment basin for evidence of spillage

2) Check valves and fittings for leaks

Work orders are to be issued to Maintenance upon discovery of any leaks, spillage, damaged drums or situations which could potentially cause the above.

The weekly inspection reports must be kept on file for a period of three (3) years.

WEEKLY MONITORING LOG

Sludge Beds

Date	Liquid Level	Leakage	Effluent Sampled	Work Order Issued	Inspector

WEEKLY MONITORING LOG

Drum Storage Area

Date	Chemical Spillage	Leaking Drums	Separation of Wastes	Drainage Ditch	Drums Logged In	Work Order Issued	Inspector

WEEKLY MONITORING LOG

Trichloroethylene Tank

Date	Leaking Valves/Fittings	Corrosion Tank/Supports	Spillage In Pit	Foundation Deterioration	Work Order Issued	Inspector

WEEKLY MONITORING LOG

Fuel Oil Tanks

Date	Spillage	Valve Fittings	Work Order Issued	Inspector

A preventive maintenance program is in effect for the entire Leeds & Northrup facility. Equipment and systems relating to conditions which could cause environmental degradation and the preventive maintenance performed are as follows:

1) Transfer Pumps

These pumps transfer sludge from the Plating Room to the settling beds where the liquid portion is separated from the sludge via settling and leaching.

The transfer pumps are monitored daily to ensure that they are functioning properly. On a monthly basis they are greased and adjusted or repaired as necessary. A record of machine maintenance is kept on file in the Plant Engineering and Services Department.

2) Fuel Oil Tanks

These tanks are visually inspected for deterioration or leakage on a weekly basis. The valve positions are checked, and the valves are lubricated as needed. A record of inspections and work orders for repairs is kept on file in the Plant Engineering and Services Department.

3) Plating Room Monitoring Equipment

The Plating Room contains equipment which indicates the volume of effluent discharged as well as the pH. This equipment is monitored daily to ensure that it is it operating properly. Plating Room personnel notify Maintenance if the equipment is malfunctioning. Appropriate adjustments or repairs are then made.

The effluent is sampled on a weekly basis to ensure it is within National Pollutant Discharge Elimination System (NPDES) permit limitations. A written record of this sampling is kept on file in the Safety Office, and a copy of the report is sent to the state.

4) Communication Systems

Proper functioning of the communication system is essential for the health and safety of the plant personnel in the event an evacuation is necessary. The evacuation alarm is tested each Sunday to ensure it is functioning properly. Appropriate adjustments are immediately made if it is not.

On Monday morning the emergency personnel beeper system is tested to ensure that Fire Brigade and Rescue Squad personnel can be alerted in the event of an emergency. Appropriate adjustments or repairs are made if necessary.

XII. Plant Operations

Potential spills may occur at one of five areas outside of the Manufacturing Building. (See attachment #3.)

1) Settling Beds

There are two settling beds located outside the manufacturing area. Here, plating sludge containing metals such as zinc, nickel, copper, iron and chrome are separated from the liquid portion by leaching through the tanks' concrete walls. These tanks have a maximum capacity of 15,000 gallons each, and are normally only filled to one-third capacity.

These tanks are adjacent to a tributary of the Wissahickon Creek which is monitored weekly for trace metal content. In the event that a tank is damaged, the contents can be pumped into the second tank until repairs can be made. Absorbent pillows should be placed behind the tanks to prevent any materials from flowing into the stream.

2) Trichloroethylene Tank

The trichloroethylene tank located outside the Shipping area has a maximum capacity of 600 gallons.

Should a leak occur, the trichloroethylene will flow into a diked pit directly beneath the tank. This material can then be removed using a suction vacuum attached to a fifty-five gallon drum, to prevent overflow onto the ground.

A whistle device minimized the potential of the tank being overfilled, again minimizing the potential for spillage.

3) Drum Storage Area

A chemical spill in the Drum Storage area can occur from a drum either rupturing or leaking. The potential adverse affects a spill could have on the environment are minimized by the design of the area.

The Drum Storage area is a covered concrete pad surrounded by a six inch retaining wall. It is designed so that spillage may drain into two collection pits of approximately 200 gallon capacity each. The capacity of the drainage pit exceeds that of the largest single container (a 55 gallon drum) plus allowing for rain water runoff.

4) Gas Cylinder Storage Area

The gas cylinders are stored on a macadam surface, surrounded by a chain link fence and a locked gate. All cylinders are chained or in

4) Gas Cylinder Storage Area (cont'd)

cylinder cages to prevent them from falling. Flammable gases are kept separate from the non-flammable.

A spill or leak in this area would result from a cylinder valve leaking or a seal rupturing. Appendix B details the types of gasses contained in the storage area and the methods for disposing of them.

5) Fuel Oil Tank Storage Area

Located behind the Manufacturing Building, adjacent to Shipping are two fuel oil tanks each having a capacity of 100,000 gallons. The two tanks are surrounded by a retaining basin capable of holding 100,000 gallons, the maximum capacity of one tank, in accordance with current regulations.

Should a leak occur, this material can be pumped out using an empty tank truck. Section XX indicates which company is to be contacted in the event of a spill to obtain a tank truck.

XIII. Material Compatibility

All waste solvents, oils, thinners and waste trichloroethylene awaiting disposal are to be stored on the Drum Storage Pad in steel, 55 gallon drums. Flammable materials, corrosives and non-flammables are to be kept separate. Waste acids are to be stored in glass bottles encased in wood or Styrofoam protective carboys. Corrosive resistant neoprene carboys may also be used.

The materials stored on the Drum Storage Pad are delivered via fork trucks and are not piped, therefore, a discussion of material transfer compatibility is not applicable.

The Drum Storage area is constructed of concrete to prevent leakage into the soil and minimize corrosion.

The settling pits are constructed of cinder blocks to allow leaching of water and retain heavy metal sludge.

The trichloroethylene tank is constructed of steel and is surrounded by a concrete holding tank. Both steel and concrete are compatible with trichloroethylene.

To avoid mixing incompatible materials, drums are logged as to their contents and only identical or compatible materials may be added to the drum. Any additions to a partially filled drum are done strictly under the direction of the Maintenance foreman. Appendix C contains a list of the most frequently disposed of wastes at L&N and the materials with which they are not compatible.

XIV. List of Emergency Coordinators and Chain of Command

Primary Emergency Coordinator:

Benjamin M. Stringer
Manager, Safety & Security
625 East Alcott Street
Philadelphia, Pennsylvania 19120

Telephone - (215) 342-2906

Secondary Emergency Coordinators: Fire Brigade Officers

Charles R. Lobs, Jr. (Chief)
62 School House Road
Chalfont, Pennsylvania 18914

Telephone - (215) 822-2820

Brent C. Talbot (Deputy Chief)
82 Market Street
Hatfield, Pennsylvania 19440

Telephone - (215) 368-0449

Technical Assistants

Rita S. Schreiner **
422 Main Street, Adams One
Harleysville, Pennsylvania 19438

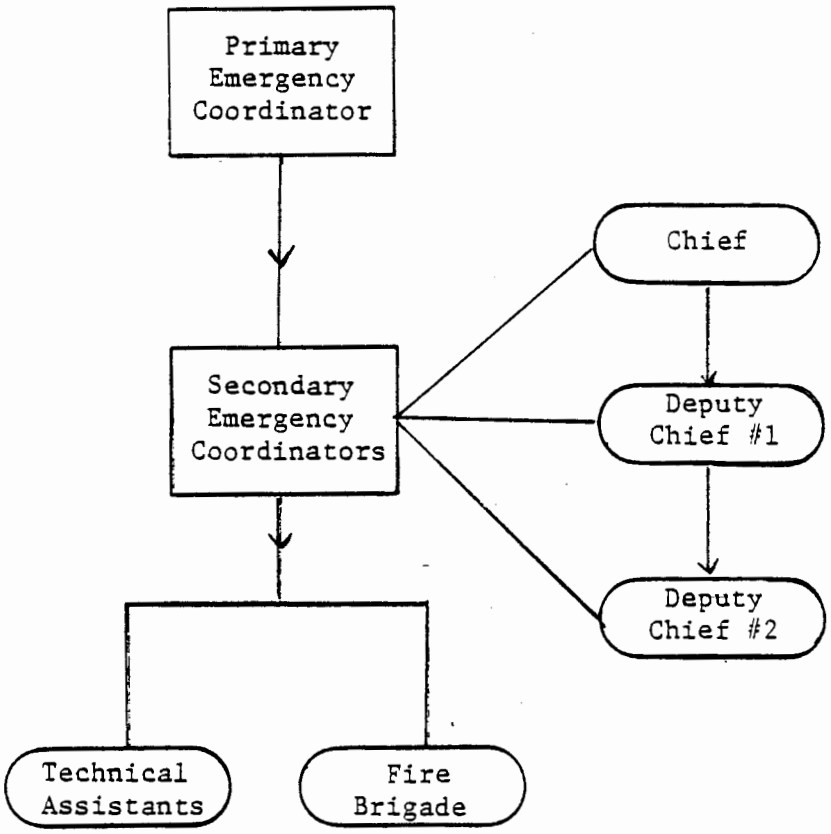
Telephone - (215) 256-6161

Corky Emele
Emele Road
Perkiomenville, PA 18074

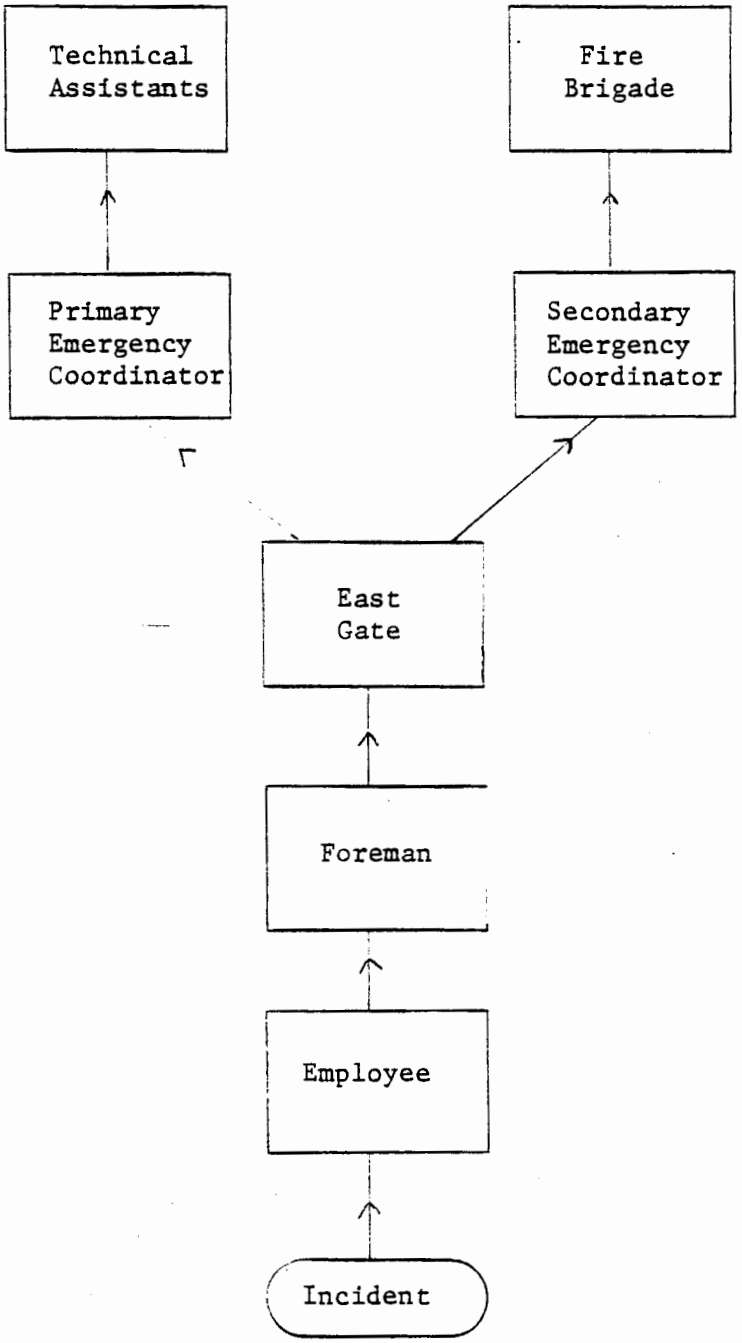
Telephone - (215) 234-4789

** Acting Primary Emergency Coordinator in absence of Manager of Safety and Security.

CHAIN OF COMMAND



XV. Notification Chain



XVI. Duties and Responsibilities of the Emergency Coordinator

As soon as an incident is reported to the Gate House, the guards are to inform the Primary Emergency Coordinator, and the Fire Brigade officers as to the situation.

The duty of the Primary Emergency Coordinator is to coordinate any cleanup and rescue operations, if necessary. This individual is to be assisted by the Secondary Emergency Coordinators and the Technical Assistants.

The Primary Emergency Coordinator shall make the decision as to what actions should be taken and which agencies are to be notified. The above shall be commensurate with the severity of the incident. In the event the situation indicates outside assistance is warranted, the Primary Emergency Coordinator is to determine which outside agencies are to be contacted.

The Primary Emergency Coordinator must assess any possible hazards to health or environment which could result from a chemical spill or fire. In the event of an oil or chemical spill, the Primary Emergency Coordinator must notify both the Department of Environmental Resources (DER) and the Environmental Protection Agency (EPA) reporting the following information:

1). Name of person reporting the incident

2). Name and Location of installation

3). Phone number where person reporting the incident can be reached

4). Date, time and location of the incident

5). Brief description of the incident, nature of the waste involved, extent of any injuries, hazards to human health or the environment

6). The estimated quantities of materials spilled

7). The extent of contamination of land, water and air (if known)

The Secondary Emergency Coordinators are the Fire Brigade Officers. They are to assist the Primary Emergency Corrdinator in determining the choice of personal protective equipment to be used, direct the personnel involved in the cleanup, and obtain additional assistance should the need arise.

The Technical Assistants responsibilities include the following:

1). Log characteristic source, amount and area involved in the spill or fire

2). Ensure that residues which have been pumped into 55 gallon drums are properly labeled and disposed

3). Within fifteen days after an incident which had significant effect on human health and the environment, file a written report to the Department of Environmental Resources. This report shall include the following information:

a). Name, address, and telephone number of the individual filing the report

b). Name, address, and telephone number of the installation

c). Date, time, and location of the incident

d). A brief description of the circumstances causing the incident

e). Description of the estimated quantity by weight or volume of the materials involved

f). An assessment of any contamination of land, water or air that has occured due to the incident

g). Estimated quantity and disposition of recovered materials that resulted from the incident

h). A description of what actions the company intends to take to prevent a similar occurrence in the future

XVII. List of Agencies to be Notified

1).	Chemtrec Incorporated (emergency contractor)	(800) 424-9300
2).	Pennsylvania Department of Environmental Resources (local) - 24 hour emergency number	(215) 631-2405 (215) 631-2400
3).	Upper Gwynedd Police	(215) 699-5861
4).	West Point Fire Department	(215) 699-4824
5).	North Penn Fire Department	(215) 699-3411
6).	North Wales Water Authority	(215) 699-3425
7).	National Response Center	(800) 424-8802
8).	Second Alarmers Association and Rescue Squad of Montgomery County	(215) 674-2541
9).	Environmental Protection Agency	(215) 597-9898

XVII. List of Agencies to be Notified (cont'd)

Notification commensurate with severity of spill.

Necessity of notification should be decided by Primary Emergency Coordinator, or appropriate incident commander (in descending order of authority).

Leeds & Northrup does not handle quantities of wastes of sufficient volume of toxicity to warrant evacuation of surrounding neighborhoods. However, the above emergency numbers have been included as a precautionary measure.

XVIII. Emergency Equipment

A. Maintenance Department

1) Absorbent materials (sand, oil-absorb, vermiculite) to be used to soak up residual spilled material

2) Portable lighting equipment - to be used in the event of a power failure or cleanup outside during the night

3) Fans - to facilitate drying or provide increased ventilation or dilution of fumes

4) Tools - (shovel, axe, bung wrench, drum carrier)

5) Submersible Pump - to pump spilled materials into an empty drum

6) Cutting Equipment - (saw, chain saw) for use in providing diking materials (i.e., cut up pallets)

7) Fork Truck - to remove damaged drums

8) Chemical absorbent pillows

B. Safety and Security Department

1) Camera/photo equipment - to document incident

2) Air contaminant monitoring equipment - to monitor potential exposure to toxic chemicals

3) Two-way hand held radio - to keep in contact with rescue workers and Gate House, should additional assistance be required

4) Personal protective equipment - (firemen's boots and coats, chemical splash goggles, gloves, hard hats) to protect employees during cleanup

XVIII. Emergency Equipment (cont'd)

C. Fire Brigade/Rescue Squad

1) Emergency vehicle - equipped with stretchers, oxygen, first aid supplies, resuscitators and personnel trained in first aid in the event a fire fighter is overcome

2) Bullhorn - to facilitate issuing commands

3) Fire fighting equipment - (boots, coats, helmets, fire hose, hydrant with clean water supply adjacent to Drum Storage area, standpipe connections throughout plant)

4) Self-contained breathing apparatus - to be used if toxic fumes are released

5) Portable fire extinguishers - to be used to control small fires or a fire where water is inappropriate

Any equipment used in cleaning up a chemical spill or fighting a chemical fire should be thoroughly cleaned before returning to storage.

XIX. Evacuation Plan

Leeds & Northrup has an Evacuation Procedure which is normally geared toward detonation threats, but which can be used to evacuate the facility in any emergency.

This evacuation plan includes transmitting to the East Gate house the proper instructions which are to be given, evacuation procedures for the first, second and third shifts, and holidays. Employee conduct during evacuation of the buildings, as well as Fire Brigade procedures are also discussed.

A copy of this plan is attached in Appendix D.

XX. Emergency Response Contractors

1) J&J Spills Service (215) 277-4511

The above contractor can be contacted in the event of a spill to assist in cleanup and transportation of hazardous wastes to designated disposal sites. This company is sufficient to handle any emergency situations Leeds & Northrup may encounter. J&J Spills Service has agreed to contact additional spill services if an unforeseen situation arises which warrants additional help or more specialized capabilities.

XXI. Local Emergency Response Teams

1).	Lansdale Volunteer Medical Unit	(215) 855-8597
2).	North Penn Hospital	(215) 368-2400
3).	Surburban General Hospital	(215) 278-2000
4).	Lansdale Medical Group	(215) 855-9501
5).	West Point Fire Department	(215) 699-4824
6).	North Penn Fire Department	(215) 699-3411

For several years, Leeds & Northrup Company has invited the area fire departments to tour the facility so that they may become more familiar with the installation layout, places where hazardous materials are handled and possible evacuation routes. A copy of this plan will be distributed to the fire departments named above to further familiarize them with our facility.

XXII. Pollution Incident History

December 14, 1981

On December 14, 1981, the Safety & Security Office received a report that a dark colored effluent of objectionable odor was seen entering the Stream behind the Plating Room Settling Tanks. On investigation, we determined the source to be the second Plating Room Settling Tank; which had apparently developed a leak.

Immediately upon discovery, the pipe leading to the stream was plugged as was the pipe leading from the Settling Tanks to the reused Water Tank. After ensuring the pipe leading from the Settling Tank to the reused Water Tank was sealed, the discharge pipe was opened, allowing only reused water to enter the stream.

The Pennsylvania Department of Environmental Resources was notified immediatley after the Safety and Security Office verified the above mentioned report. Mr. Stephan Sinding of the DER, reported to the scene to asses the impact on the environment.

It was ascertained that the dark color and smell resulted from the reaction of sodium sulfide with the effluent metals, which causes the metals to precipitate out, allowing only the liquid portion to filter-out to the outfall. Apparently, the second Settling Tank developed a leak, allowing the sulfide to pass through the filtration bed and enter the stream. An estimated 630 gallons of effluent containing this sulfide (based on a seven GPM flow for approximately 1.5 hours) entered the stream.

Samples were taken on December 14, 1981, both by the State and ourselves to determine if any trace metals entered the Stream above permit limitation. Further samples were taken on December 16, 17, 18, 1981, and on January 5, 1982, after returning from a Christmas Shutdown.

XXII. Pollution Incident History - (Continued)

The results of the December 14, 1981, sampling indicated an excursion above permit limitations at the effluent for three regulated parameters - - zinc, cadmium, and iron. The parameters down stream were all within permit limitations, indicating the diluation effect of the stream.

The data from the subsequent December samplings indicated no excursions above permit limitation. On January 5, 1982, the plug in the pipe leading from the Settling Tanks to the reused Water Tank was removed. The effluent sample was within permit limitations.

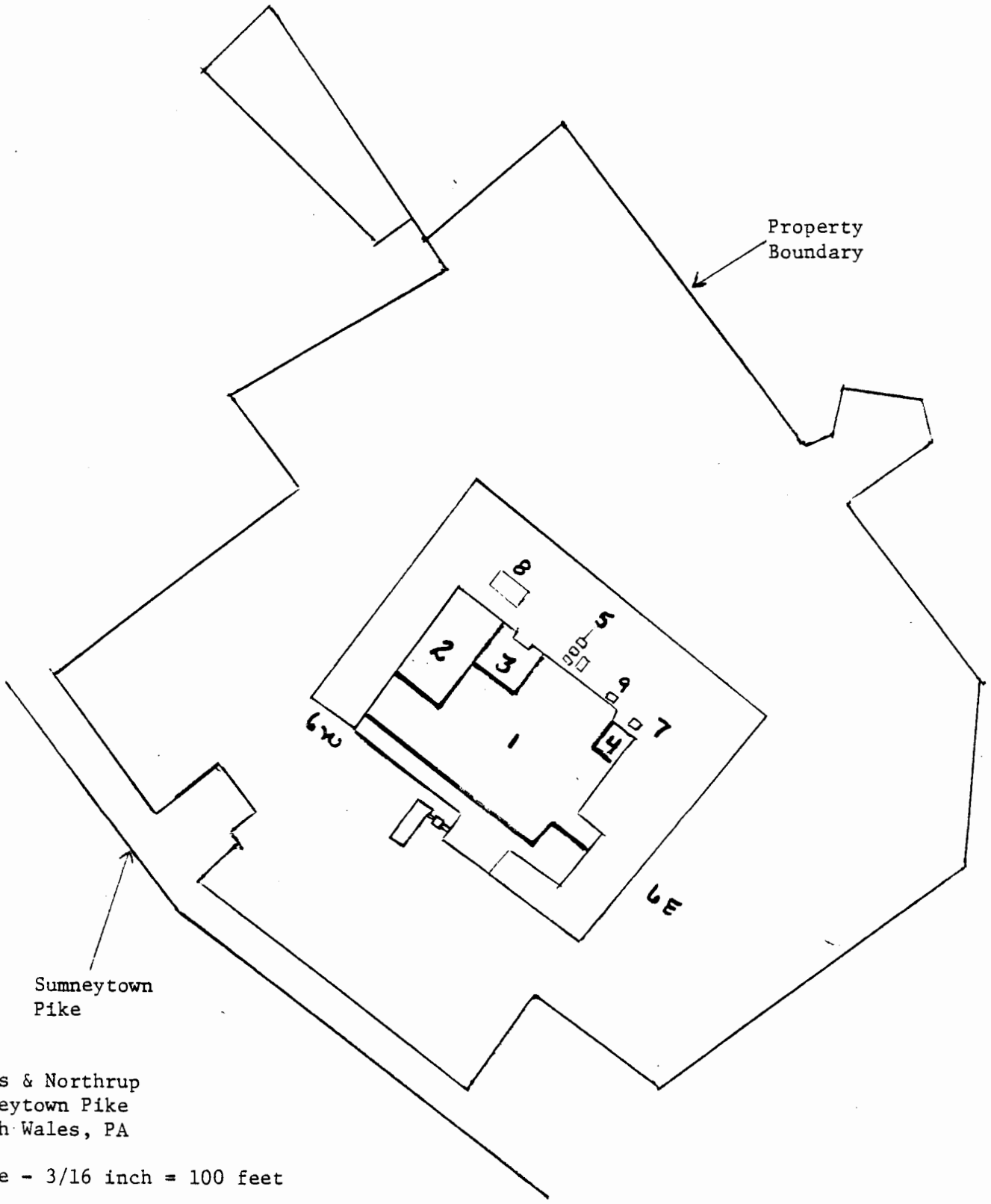
To date, the leaking tank has not been put back in-service, and no additional incidents have occured.

XXIII. Implementation Schedule

The Evacuation Plan for installation personnel (Appendix D) is currently undergoing updating as to the key personnel involved. A copy of this plan will be forwarded to the Department of Environmental Resources upon my receipt.

Attachment II

Supplement to Lansdale Quadrangle
(Site at arrow)



Leeds & Northrup
Sumneytown Pike
North Wales, PA

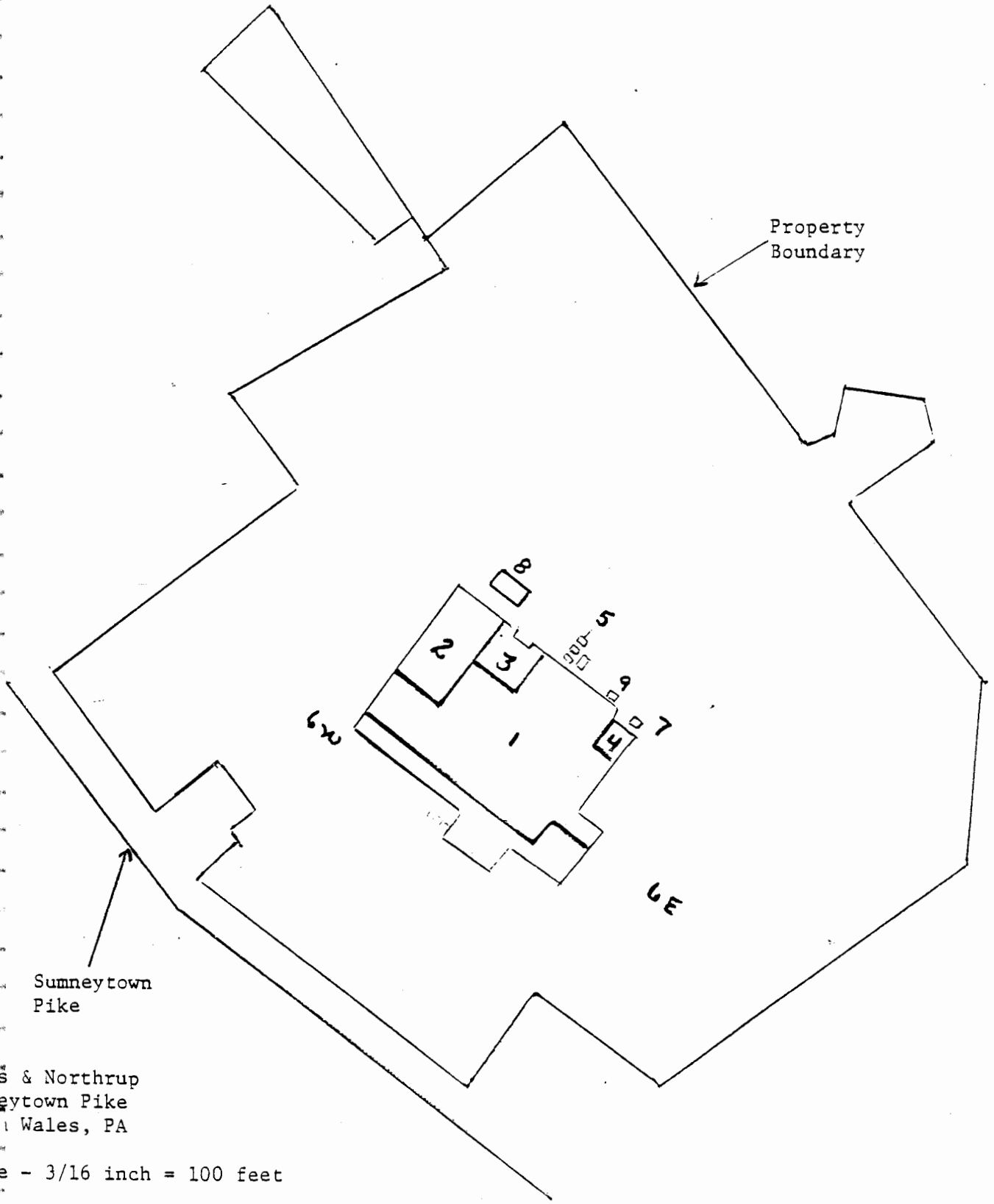
Scale - 3/16 inch = 100 feet

Facility Drawing Key

1. Area occupied by manufacturing activities
2. Material Storage area
3. Shipping
4. Receiving
5. Outfall Pipes (from settling beds)
6. Secured gates (E - east, W - west)
7. Drum Storage Pads
8. Fuel Oil Tanks
9. Trichloroethylene Tank

Attachment II

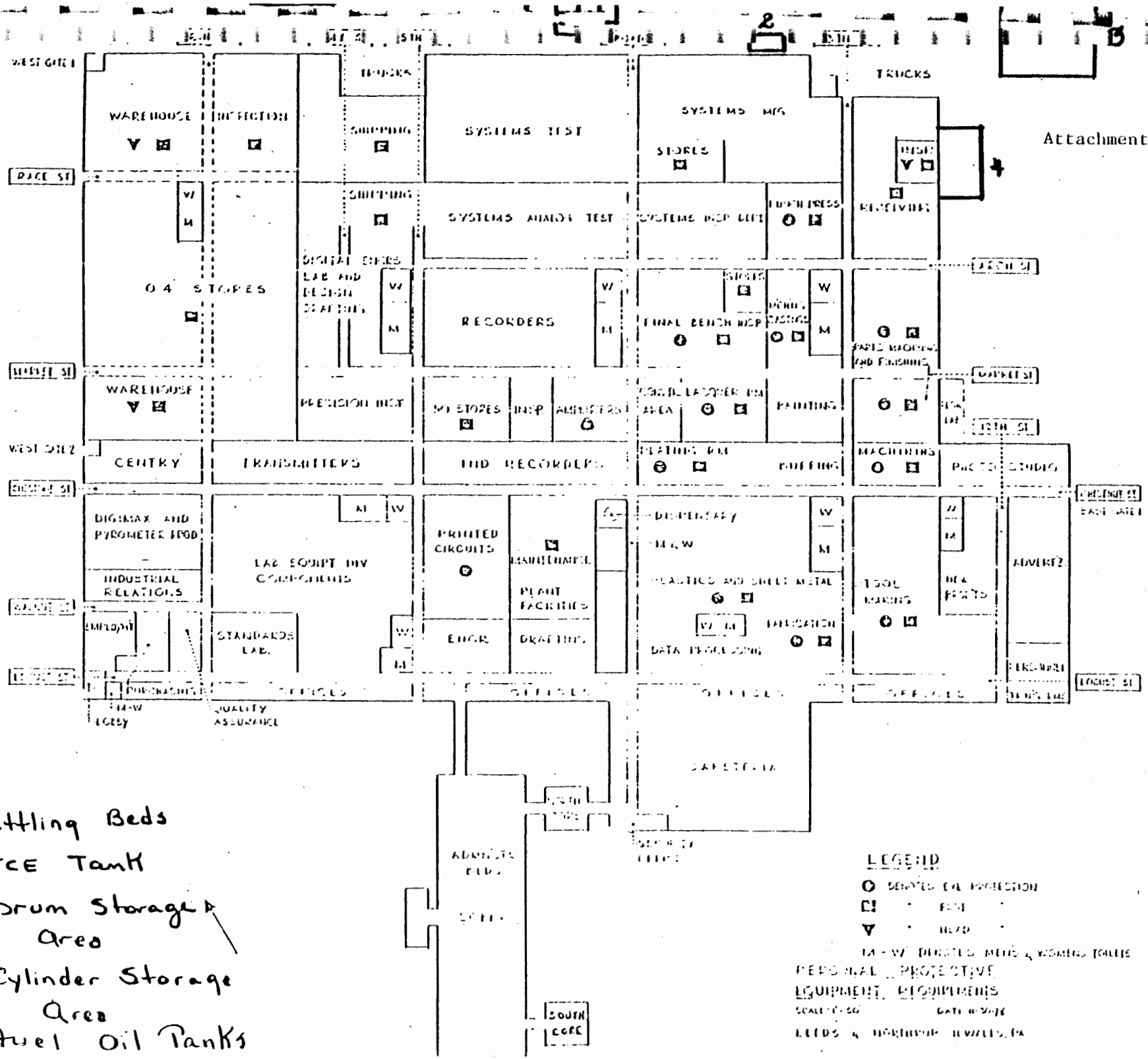
Supplement to Lansdale Quadrangle
(Site at arrow)



ds & Northrup
umneytown Pike
Wales, PA

cale - 3/16 inch = 100 feet

Attachment #3



1- Settling Beds
2- TCE Tank
3- Drum Storage Area
4- Cylinder Storage Area
5- Fuel Oil Tanks

Appendix A

Procedure for Waste Disposal

Wastes are considered hazardous if they pose a substantial threat to human health or the environment. Garbage and refuse such as scrap paper are not considered hazardous, and are not subject to the procedure detailed below.

1) All containers of flammable or corrosive wastes should be labeled as such and identified as to their contents (waste thinner, spent xylol, waste alcohol, etc.)

2) Containers of non-flammable wastes are to be identified as to their contents (waste coolant, spent carbon tetrachloride, etc.)

3) All flammable wastes should be kept in a safety storage can while awaiting disposal. Safety storage cans are available through the Security Office.

4) Spent materials will <u>not</u> be accepted for disposal unless contents have been properly identified and labeled. At no time should spent materials be disposed of via sanitary sewer using drains or lavatory facilities.

5) Pickup Procedure: Call Maintenance foreman (ext. 2257) detailing the type of waste and the amount so that it can be logged and picked up by Maintenance.

If you have any questions regarding disposal of wastes or whether a waste is considered hazardous, please call Maintenance foreman for clarification.

Appendix B

Disposal of Leaking Cylinders

A. Flammable Gases (hydrogen, oxygen, carbon monoxide)

1) All sources of ignition should be eliminated

2) If practical - remove cylinders to outside

3) Tag cylinder as defective

4) Toxic gases should be handled using self-contained breathing apparatus

5) Adjust gas discharge to a moderate discharge rate

6) When cylinder is empty, close valve and return to supplier

7) Isolate area until gas has dispersed

Special Consideration

I. Oxygen

a) avoid contact with skin or eyes as burns may occur

b) for a fire involving oxygen

small - dry chemical or CO_2 extinguisher
large - foam extinguisher or water

II. Hydrogen

a) avoid contact with skin as burns may occur

b) vapors can cause dizziness or suffocation

B. Inert Gases (nitrogen, argon, helium)

1) Inert gases create a hazard by displacing oxygen, therefore, remove cylinder to outside or under a hood.

2) Cylinder valve should be cracked to allow gas to escape at a moderate rate

3) Close valve when gas has been discharged

4) Tag as defective and return to supplier

Disposal of Leaking Cylinders (cont'd)

Special Considerations

I. Chlorine and Ammonia

a) avoid contact with skin or eyes as it may cause burns

b) vapors are highly toxic and so self-contained breathing apparatus should be used

c) protective clothing should be worn

d) escaping vapors may be diluted with a water fog or spray

Appendix C

Incompatible Waste Materials

Material	Incompatible
Acetone	Nitric + acetic acid Nitric + sulfuric acid 1,1,1 - Trichloroethane Trichloroethylene
Carbon Tetrachloride	Allyl alcohol
Instapak Component A	Water Alcohol Strong bases
Lonco Solve (1,1,1 - Trichloroethane)	Acetone Sodium hydroxide Liquid nitrogen
Methanol/Isopropanol	Chromic acid Lead perchlorate Sodium hydroxide + Trichloromethane
Toluene	Chlorine Nitric acid Hydrogen sulfide Nitrogen dioxide
1,1,1 - Trichloroethane	Acetone Sodium hydroxide Liquid nitrogen
Trichloroethylene	Strong caustics Chemically active metals (magnesium, aluminum) Potassium hydroxide Sodium hydroxide

CLOSURE/POST-CLOSURE

X. CLOSURE/POST-CLOSURE PLAN

This section is submitted in accordance with the requirements of 75.264 (o)(2)-(3), and (s). This plan identifies the steps that will be necessary to partially and completely close the facility at any point during its intended operating life.

For the purposes of this discussion, the "Facility" includes the hazardous waste storage area (recognizing storage at any time is for less than ninety days), the waste treatment system (covered under NPDES Program) and the concrete block sludge filter beds.

This facility does not include landfills, underground injection, or waste piles. Therefore, contaminated runoff or control of air borne particulates is not a consideration. Waste is stored as drummed materials on a concrete pad, thereby preventing groundwater contamination.

Storage Area

Because the drum storage area is covered under the less than 90 day storage provision [75.262(g)], closure and post-closure plans are not required. The hazardous waste storage area at Leeds & Northrup will be

closed when it is deemed to be no longer necessary. This will occur upon cessation of production and the subsequent cessation of generation of hazardous wastes, and will be accomplished by manifesting and removing drummed waste materials - (approximately 70 drums maximum).

Waste Treatment System

The waste treatment system at Leeds & Northrup is covered under the NPDES program and is not subject to closure/post-closure requirements. As with the drum storagearea, the waste treatment system will be deactivated when it is no longer required for the operations at this facility. Activities required to deactivate the facility will involve removal of wastes and tank contents, disconnection of piping and valves, and decontamination of equipment, if necessary.

Concrete Block Sludge Filter Beds

These structures are part of our existing waste treatment system. However, as explained in the introduction to this application, they could possibly be classified as surface impoundments and, as such, would require closure and post-closure plans. As previously discussed, plans are in progress to revise the waste treatment system, eliminating the use of these sludge filter beds.

Closure of these sludge filter beds is being approached as good faith compliance in closing these low hazard potential units which may potentially be considered surface impoundments. An investigation of the site relative to environmental concerns such as potential for groundwater contamination will be conducted as a part of closure plan development. Current schedules call for submission of the draft plan to the Department for review and approval by. Implementation of the closure plan will take place as soon as approval is obtained.

The closure plan being developed well address

- o type and amount of wastes previously contained
- o mobility and migration potential of hazardous constituents
- o site location, topography, proximity to waste supplies
- o climate
- o geological and subsurface hydrogeology characteristics of the site

A post-closure plan will also be developed based on the findings of the site evaluation study and discussions with PADER.

FINANCIAL ASSURANCE

XI. FINANCIAL ASSURANCE

1. Closure/Post-Closure

Closure plans will be developed for the concrete block sludge filter beds as discussed in Section X. These plans will include estimates of closure costs since immediate implementation is desired. Post-closure plans and financial requirements are also being developed and will be submitted to PADER for approval.

2. Liability Insurance

Leeds & Northrup carries general liability insurance with Travellers Insurance Company. The policy has maximum coverage of 125,000,000 dollars, with Leeds & Northrup being self insured through General Signal for the first quarter million dollars.

CONTAINERS

XII. CONTAINERS

1. Description of Containers

At this facility hazardous waste which is stored in containers is primarily stored in 55 gallon drums and 25 gallon carboys in the drum storage area located at the North-East section of the plant. A facility layout drawing, identifying this location is included as Appendix F. A list of waste materials stored is given in Appendix E along with the following information: EPA Hazardous Waste Number, DOT shipping container specification number, container capacity, material of construction, and hazard characteristics. Hazardous wastes containers are not stored at the Leeds & Northrup facility for a period greater than 90 days.

The storage area has a maximum capacity of 150 drums/carboys. All of the waste containers in this area are stored on one vertical tier only with adequate space between drums for visual inspection. All drums are painted to prevent rusting and labeled to identify waste type. Incompatible waste are separated and the bungs and rims of all containers are secured at all times. The only wastes stored at this facility are those generated on-site.

There are no solid pipes connected to any of the drums; all waste materials added to the drums are transferred manually with either portable pumps or pails.

2. Container Storage Area

The container storage area is located 60 feet from the main building and consists of a 30' x 48' concrete pad which contains both raw and waste materials separated by a curb. The pad has a 6" high curb around the perimeter. The pad is graded such that any spillage will drain to either one of two, 200 gallon sumps. As these sumps fill, the spillage is manually transferred to another drum for disposal. An illustrtion of the Container Storage area is shown in Figure 6.

Access to the storage area is via a 6 foot wide ramp which ascends and then decends onto the pad. The area has a 9' high roof but no walls. The curb and access pad prevent run on. However, since there are no walls around the perimeter of the structure, rain water can enter the pad. If rain water should enter the pad, it will drain to one of the collection sumps and be disposed of with spillage existing in the sump.

The area is divided by a curb into two areas: raw materials and waste materials. The chemicals are further segregated into three sections: 1) corrosive materials, 2) flammable materials, and

3) non-flammable materials. Aisles between rows of containers are four feet wide. Drums are not stacked atop one another and waste containers are positioned side by side to allow for visual inspection and easy removal in the event of a spill.

3. Description of Container Storage Configuration

A description of the container storage area is included in Section 2 above, and is illustrated in Figure 6.

4. Inspection Log

A sample of the weekly inspection log (titled by Leeds & Northrup as "Weekly Monitoring Log") is illustrated in Figure 4. The area is inspected weekly and any leakage or spills are reported to the Emergency Coordinator (or designated authority) as described in the PPC plan.

5. Incompatible Waste

All containers are clearly labeled identifying the contents contained within. A list of incompatible materials has been prepared and submitted to the maintenance foreman. This foreman is responsible for the area and supervises additions to partially filled containers. As described under section 2 above, the

containers are segregated into three areas on the storage pad, to further prevent mixing of incompatible materials. Drums used to store wastes previously have containedmaterials that would be compatible with the waste. For example, a drum that originally contained TCE would be used to store TCE waste.

6. Ignitable and Reactive Waste

There are no reactive wastes on site. The ignitable wastes are stored as described in Sections 2 and 5 above.

7. Wastes From Off-Site

There are no wastes received from another site at this facility.

8. Closure

Although closure plans are not required for facilities which store hazardous wastes on site for less than 90 days, a brief closure plan has been prepared for the Leeds & Northrup container storage area. The closure and post-closure plan for the container storage area is provided in Figure 4. This plan will be revised to reflect the closure plan that will be developed as discussed in the "CLOSURE" section of this application.

WEEKLY MONITORING LOG

Drum Storage Area

Date	Chemical Spillage	Leaking Drums	Separation of Wastes	Drainage Ditch	Drums Logged In	Work Order Issued	Inspector

Figure 4. Weekly Inspection log

December 4, 1981

CLOSURE AND POST CLOSURE PLAN

LEEDS AND NORTHRUP'S

HAZARDOUS WASTE STORAGE FACILITY

I. How and When the Facility will be closed

The hazardous waste storage facility at Leeds and Northrup will be closed when it is deemed to be no longer necessary. This will occur upon ceasation of production and the subsequent hazardous chemicals generated.

Closure of this facility will be accomplished in two phases:

(1) Manifesting and removal of drummed hazardous wastes - approximately 70 barrels maximum.

(2) Manifesting and removal of plating sludge from settling tanks - approximately 10,000 gallons maximum.

Landfills, underground injection and waste piles are not used at L&N's Hazardous Waste Storage Facility. This being the case, contaminated run-off or control of airborne particulates is not a consideration to us at our facility.

At closure, as always, primary precautions are aimed toward controlling any chemical spillage which may occur from accidental rupture of a drum.

Ground contamination is prevented by storing the drummed materials on a concrete pad hence minimal mitigation of surrounding soil and further, into the ground water.

Closure of the settling beds would entail emptying beds of their contents (plating sludge), mainfesting the material and having it taken for dewatering, then disposal.

Post-closure monitoring would be in accordance with directives issued by the Department of Environmental Resources, Bureau of Water Quality Management. Our plating room effluent is regulated by the DER, hence our provision to follow these directions.

II. Cost for Facility Closure

$6,100 - Removal and disposal of drums and removal of sludge.

REV. 3-11-83

Figure 5.

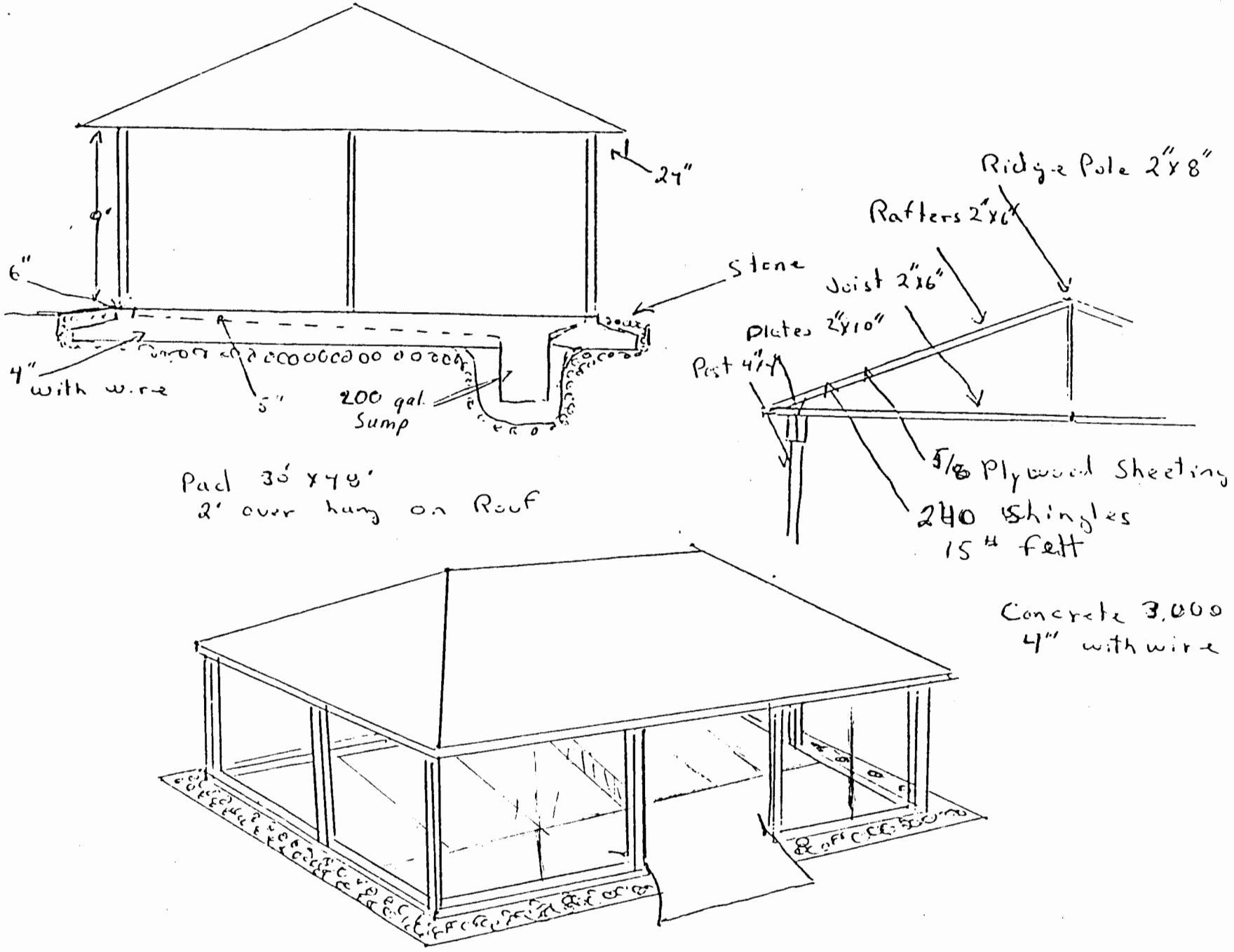

24"
9'
6"
Stone
4" with wire
5"
200 gal. Sump
Pad 30' x 48'
2' over hang on Roof
Ridge Pole 2"x8"
Rafters 2"x6"
Joist 2"x6"
Plates 2"x10"
Post 4"x4"
5/8 Plywood Sheeting
240 Shingles
15 # felt
Concrete 3,000
4" with wire

Figure 6.

SURFACE IMPOUNDMENTS

XIII. SURFACE IMPOUNDMENTS

This section provides a description of the concrete block sludge filter beds which are being considered surface impoundments for the purposes of this application (See INTRODUCTION). Information will be provided as required by PA75.264(s).

1. Design Specifications

A. Dimensions:

Each of the three sludge filter beds has a surface area of 450 square feet (15' x 30') and an average depth of 6.6 feet. The beds were placed in-ground to a depth of 3.6 feet with 3 feet extending above ground. The maximum capacity of each filter bed is 22,000 gallons.

B. Freeboard:

The sludge filter beds are normally filled to only one-third capacity. This provides over six feet of freeboard which is more than sufficient for preventing over-toping of the bed as a result of over-filling, wave action, or a storm.

C. Surface Grades:

This section does not apply since the sludge filter beds are not used for disposal. After use of the beds is discontinued, final grades at the site will depend on the method of closure pursued (see Section X).

D. Dikes and Berms:

Specifications concerning earthen dikes and berms do not apply since the filter beds are constructed of concrete blocks with more than six feet of freeboard. Dikes and berms are not required for additional waste containment.

E. Materials of Construction:

The walls of the filter beds are constructed of a porous concrete block. The bases of the beds are constructed of a relatively impervious poured concrete.

F. Static Loading:

The beds are normally filled to a maximum of one-third capacity (7300 gallons). Assuming a specific gravity of 1.02, the maximum vertical static load should be 140 pounds per square foot (psf). The beds were built to withstand a vertical and horizontal pressure of at least 500 psf which provides an adequate safety factor against failure due to loading.

G. Construction Procedures:

Not applicable

H. Perimeter Markings:

The regulations require that the outer perimeter of all liner and liner systems be well marked to assure protection of the liner. Since the filter beds do not utilize a liner system, this section does not apply.

I. Wind Control:

The treated wastewaters and sludge that are contained in the filter beds are not of a nature that would make them subject to dispersal by wind. Regardless, the waste is protected from wind by a freeboard of over six feet.

J. Piping, Feed Shutoff:

The system was designed so that the flow of waste to the filter beds can be shut off in the event of over-topping or filter bed failure. Three shut-off valves exist within the wastewater treatment system in the plating shop: at the mixing tank, pump, and outgoing pipe. In addition, there is a shut off valve outside, immediately prior to entering the sludge filter beds.

K. Seasonal and Groundwater Table Provisions:

The regulations require that surface impoundments maintain a minimum distance of four feet from the subbase and the seasonal high water, and a minimum distance of 8 feet between the subbase and the true groundwater table. These sludge filter beds were not installed under RCRA regulations and, therefore, this information is not currently available. However, the soil and groundwater characteristics will be evaluated in the site investigation to be performed in developing a closure procedure for these sludge filter beds (see Closure, Part X).

Because of the French drain system surrounding the base of the filter beds, the majority of filtrate is drained to the NPDES regulated discharge point rather than percolating through the soil to the groundwater. There is no visual evidence of a high groundwater table such as surface ponding of water or collection of water in the empty sludge filter beds.

L. Cap:

Capping requirements will depend on the method of closure selected (see Section X).

M. Daily and Intermediate Cover:

This section does not apply since the sludge filter beds are not used for disposal and,therefore, do not require daily and intermediate cover.

N. Gas Venting:

The sludge in the filter beds is a metal hydroxide sludge and is not expected to generate gas as a result of decomposition processes. Therefore, there was no need to design and install a gas venting system.

O. Surface Water Management:

The sludge filter beds were designed so that an average of approximately three feet of the bed extends above ground surface. Additionally, the ground is sloped away from the beds. This design prevents surface water from entering the filter beds.

P. Run-on Water Diversion:

Run-on water is handled as described in subsection O, Surface Water Management.

Q. Groundwater Protection:

The French drain system surrounding the base of the filter beds drains the majority of filtrate to the NPDES regulated surface discharge rather than allowing it to percolate through the soil to the groundwater. Additional consideration of groundwater protection will be given in closure plans being developed. (see Section X).

2. Liner System Design Drawings and Specifications

Not applicable

3. Leachate Collection and Storage Systems

Not applicable

4. Leachate/Run-off Treatment

Not applicable

5&6. Inspection Procedures and Schedule

The waste treatment operator inspects the sludge filter beds daily to assure that sufficient freeboard exists. On a weekly basis he inspects the beds for signs of leakage or deterioration. The effluent is also monitored weekly. The results of these inspections are documented on log forms as shown in the PPC Plan (Section IX).

7. SIER Plan

A SIER Plan was not developed because use of the sludge filter beds is being discontinued. In the interim, all components of the SIER Plan relating to the sludge filter beds are being addressed by the PPC Plan (Section IX).

8. Incompatible Waste

The filter beds receive waste from only three sources:

- o sludge from closed loop treatment system
- o waste from batch treatment
- o sludge from clarifier (following neutralization of rinse waters)

No chemical treatment is occurring in the filter beds and all wastes added to the beds are compatible. Details concerning the compatibility of individual chemicals used throughout the plant that contribute to the waste are available in the Section V (Ignitable, Reactive or Incompatible Wastes).

9. Special Procedures for Ignitable and Reactive Wastes

No special procedures beyond those listed in the "IGNITABLE, REACTIVE OR INCOMPATIBLE WASTES" section of this application are required for the sludge filter beds.

10. Buffer Zone

A buffer zone of well over 50 feet exists between the property line and the sludge filter beds within which no solid waste treatment, storage, or disposal activities take place. No buildings or structures have been placed within 25 feet of the sludge filter beds.

11. VONC Plan

A VONC Plan was not developed because the use of the sludge filter beds is being discontinued. In the past, there have been no problems concerning vectors, odors, or noise from the filter beds. None of these problems are expected prior to discontinuing use of the filter beds. If problems should occur, they will be dealt with on a case by case basis.

12. Access Road

The access road to the filter beds is paved with asphalt and is suitable for use in all types of weather. The access road is restricted to company personnel and has minimal traffic volume. The cartway width is greater than twelve feet and the grade does not exceed 12 percent.

13. Emergency Equipment

Standby equipment is readily available for use in the event of an emergency. A complete list of this equipment is provided in the PPC Plan under the section "Emergency Equipment". Personnel are given training in the proper use of this equipment as described in the Personnel Training Program (Section VIII).

14. Unloading Area

This section does not apply because wastes are not hauled to the facility for deposit in the sludge filter beds. Wastes generated on-site enter the filter beds via a pipeline.

15. Dust and Waste Tracking

Dust has not been a problem and is not expected to be a problem in the future. If it should become a problem, dust suppressants such as sodium chloride and water can be used.

Equipment and machinery are not routinely used within the filter beds. Sludge is removed via a suction line; therefore, waste tracking does not occur.

16. Measuring Facilities

This section does not apply because no off-site wastes are handled by this facility.

17. Closure and Post-closure

Special Closure and Post-closure plans will be developed for the sludge filter beds as discussed in Section X.

APPENDIX A,B, AND C
(ATTACHED TO PPC PLAN WITHIN APPLICATION)

APPENDIX D

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 631-2420

March 2, 1983

RECEIVED
MAR 07 1983
R. S. SCHREINER

Ms. Rita Saga, Industrial Hygienist
Leeds and Northrup Company
Sumneytown Pike
North Wales, PA 19454

Re: EPA Identification No. PAD 002277952
Facility Name: Leeds and Northrup Company
Sumneytown Pike
North Wales, PA 19454

Dear Ms. Saga:

This letter constitutes a formal request for Part B of your application for Hazardous Waste Management Facility Permit under the Hazardous Waste Management Regulations, 25 PA Code Chapter 75, Subchapter D, for the facility referred above. This request is made under the authority of Section 75.265(z)(6) of the regulations. You should refer to the hazardous waste management regulations that appeared in the Pennsylvania Bulletin dated September 4, 1982, which was recently mailed to you for the requirements of the Part B application. Your Part B application must be submitted no later than September 1, 1983. If there is information that is being claimed as confidential, indicate this according to the requirements of Section 75.265(z)(16).

If your facility is not a TSD (treatment, storage or disposal site), or if you stopped functioning as a TSD facility after November 19, 1980, or if you qualify under the Permit by Rule provision of the regulations, it will be necessary for you to contact one of our field offices, and to arrange for an inspection to confirm this. Our field offices and the areas covered are the Bethlehem Office, phone number 861-2070, covering Berks, Lehigh and Northampton Counties; and the Norristown Office, phone number 631-2420, covering Philadelphia, Bucks, Chester, Delaware and Montgomery Counties.

If you functioned as a TSD after November 19, 1980, it will be necessary for you to submit four copies of a closure plan to Mr. Bruce Beitler of this office.

Enclosed are reference checklists for your Part B application that are to be used to insure your application contains the minimum information required. These checklists are to be used to assist you in your Part B application and our subsequent review, although the checklists are not a substitute for reviewing and addressing the hazardous waste regulations themselves. Because you may be anticipating additional facilities at your location, we have included checklists for every type of facility covered by the Department requirements. Please use only those checklists that apply to the types of facilities for which you are making application.

Your Part B application will be reviewed for a hazardous waste management TSD Permit by both the U. S. Environmental Protection Agency and the Department of Environmental Resources until the Commonwealth of Pennsylvania receives Phase II Interim Authorization under the RCRA Program to solely administer a permitting program.

You should submit the Part B application to both agencies for their concurrent review. This would require that the hazardous waste requirements under Pennsylvania regulations as well as the hazardous waste management requirements under the Federal program would have to be addressed.

When completed, please transmit your application and five copies (or seven copies if there is an incineration facility) to our office, and if you have any questions or desire to have a pre-application conference, please contact Mr. Lawrence H. Lunsk, Solid Waste Facilities Supervisor, at the letterhead address, or by calling 215 631-2420.

Very truly yours,

WAYNE L. LYNN
Regional Solid Waste Manager

Re P770

ENCLOSURE

APPENDIX E

APPENDIX E

Wastes Stored on Site

Waste Material	EPA ID #	DOT Shipping #	Volume/Container Type*	Hazard Characteristics
Spent Solvents				
1,1,1-Trichloroethane	F001	UN2831	55 gal. drum	Toxic
Trichoroethylene	F001	UN1710	55 gal. drum	Toxic
Freon		UN1965	55 gal. drum	Flammable Liquid
Carbon Tetrachloride	F001	UN1846	55 gal. drum	Toxic
Xylene	F003	UN1307	55 gal. drum	Flammable Liquid
Acetone	F003	UN1090	55 gal. drum	Flammble Liquid
Methyethylketone	F005	UN1193	55 gal. drum	Flammable Liquid
Toluene	F005	UN1294	55 gal. drum	Flammable Liquid
Waste Paint and Lacquer Thinners	D001	UN1294	55 gal. drum	Flammable Liquid
Isopropyl Alcohol		UN1219	55 gal. drum	Flammable Liquid
Sodium Hydroxide	D002	UN1824	Clarifier Tank	Corrosive
Potassium Hydroxide	D002	UN1814	Clarifier Tank	Corrosive
Hydrochloric Acid	F006	UN1786	25 gal. carboys-glass	Corrosive

*All 55 gallon drums used to store wastes at this site are constructed of steel.

APPENDIX F